

18 August 2022

Hon Nick Champion MP
Minister for Trade and Investment
Minister for Housing and Urban Development
Minister for Planning
Level 10 1 King William Road
ADELAIDE SA 5000
Email: MinisterChampion@sa.gov.au

Dear Minister,

**RE: INCORPORATION OF THE LIVABLE HOUSING DESIGN GUIDE
STANDARDS INTO THE NATIONAL CONSTRUCTION CODE**

Every person has the right to an adequate standard of living; a right to live in a home that is appropriate, affordable and accessible for the individual's needs. This fundamental basic human right has been denied to those living with disability for far too long and as such has needed to be included as part of Australia's obligations under the United Nations Convention on the Rights of Persons with Disabilities (since 2008), Australia's Disability Strategy 2021-2031¹, and South Australia's own *Disability Inclusion Act 2018*.

In South Australia 1 in 5 people live with disability. Our ageing population is continuing to grow. Despite this, we continue to accept that an increasing proportion of our population must either reside in homes that they cannot easily enter, move around in or shower in or are forced to move into alternative accommodation. This is increasingly complicated by the shortage of affordable housing options available and by the high cost of retrofitted modifications. Well beyond residents, a move to universal design will enable people with disabilities to visit others freely, thereby reducing the very real threat that inaccessibility poses for isolation and loneliness.

In 2010 COAG's National Disability Strategy included a commitment to work towards the goal of "all new homes will be of an agreed Universal Housing Design standard by 2020 with interim targets to be set within that 10 year period". However, in 2020, only 5% of new homes had been built in line with these standards. This shows that a voluntary guideline does not work.

You and your government have an opportunity to make a commitment to people living with disability by agreeing to mandate the minimum accessibility standards for new residential construction projects based on the Liveable Housing Design silver

¹ "Policy Priority 1: Increase the availability of affordable housing Access to affordable, safe and long-term housing underpins a person's sense of home and their ability to participate in their communities. For people with disability to have choice about where to live and with whom, a range of housing options are required, including public and community housing, private rental and home-ownership." *Australia's Disability Strategy 2021-2031*

standards under the National Construction Code 2022. Adhering to higher standards would remain voluntary.

The requirements of the updated Code address basic access needs that make residential properties easier to enter and navigate in and around, as well as ensuring further adaptations can be made later to suit a resident. People living with disability, the ageing population, people living with temporary mobility issues and young families would significantly benefit from this commitment. They are not asking for the world; they are asking for very simple changes to be made by the housing industry that will have a huge impact on their quality of life.

Recognising the significance of the decision the South Australian government is about to make in the lead up to the first Building Minister's meeting since the Federal election, we, as individual organisations, have come together as a group with the same goal: to appeal to you to make a commitment to people living with disability, older people, their friends and families, the disability and ageing sector, people with temporary mobility issues and young families. We stand united because your decision has the potential to positively impact the lives of hundreds of thousands of South Australians, open an abundance of social and economic opportunities as well as reduce the reliance of some of our vital services which are currently stretched to their limits.

Short-term cost impacts will be minimal in the context of overall construction budgets, particularly for operators with strong building and design expertise, and these will be reduced or eliminated once accessible building plans and materials become "standard". In any case, as the Centre for Universal Design Australia has pointed out, the cost to retrofit these features is at least 20 times higher compared to doing so as part of the initial build.

We acknowledge the hesitancy from the building industry. However this is not new or unexpected. This has been years in the making and many builders have been proactive in implementing appropriate changes to their businesses in preparation. However, we recognise that some have not, and therefore understand if the government decided to implement a twelve-month implementation timeframe (as recommended by the ABCB earlier this month).

To combat the concerns around certain elements of the proposed standards we would propose that the building industry and disability and ageing community work together to provide you sensible advice on exemptions where appropriate and necessary (for example, a small proportion of blocks with steep incline from the proposed entry to the footpath – property blocks that are likely to be in a very specific geographical location within our State, for example the Adelaide foothills).

Furthermore, no matter what side of this conversation you hail from (disability, ageing, the building industry), the majority agree that national consistency is of utmost importance. Mobility, safety and equity of access at home is of equal importance no

matter where we live, and it is reasonable for the public to expect that the adoption of the Livable Housing Design standards being taken up interstate can be mirrored here in South Australia.

We implore you to support and mandate the minimum accessibility standards for new residential construction projects based on the Livable Housing Design silver standards under the National Construction Code 2022.

Yours sincerely

 Anthony Coupe SA Chapter President, Australian Institute of Architects	 Brugh O'Brien Principal: Future of Home, TACSI
 Jane Mussared Chief Executive, COTA SA	 Tim Naughtin Campaign Director, Building Better Homes
 Simon Schrapel AM Chief Executive, Uniting Communities	 Greg Ward Chief Executive Officer, Novita
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